

MELANIE A. HILL, ESQ.  
Nevada State Bar No. 8796  
LAW OFFICE OF MELANIE HILL  
9345 W. Sunset Road, Suite 100  
Las Vegas, NV 89148  
Tel: (702) 362-8500  
Fax: (702) 362-8505  
Melanie@MelanieHillLaw.com  
*Attorney for Defendant Michael Sabicer*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

\*\*\*\*\*

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL SABICER,

Defendant.

Case No: 2:12-cr-00082-MMD-VCF-12

**DEFENDANT MICHAEL SABICER'S**  
**UNOPPOSED MOTION TO**  
**CONDUCT A PRE-PLEA**  
**PRESENTENCE**  
**INVESTIGATION REPORT AND**  
**PROPOSED ORDER**

COMES NOW appointed counsel Melanie A. Hill, Esq. counsel for defendant Michael Sabicer, and hereby moves this for an Order directing the Probation Department to prepare a Pre-Plea Presentence Investigation Report on Defendant Michael Sabicer for the following reasons:

- 1) It appears that Defendant Sabicer may be subject to substantially different sentencing ranges depending upon his verified criminal history as well as other factors surrounding his offense and plea. Defendant Sabicer's decision regarding how to proceed may be drastically impacted by his sentencing exposure in this

1 regard. The pre-plea presentence report will promote judicial economy and aid in  
2 the manner in which this case is ultimately resolved.

3  
4 2) Undersigned counsel therefore respectfully requests an order directing the  
5 Department of Probation to conduct a pre-plea presentence investigation report as  
6 soon as possible as there is a time sensitive plea offer on the table.

7  
8 3) Undersigned counsel has spoken to the prosecutor, Assistant United States Attorney  
9 Kimberly Frayn, regarding this request and she has no opposition.

10 DATED this 18<sup>th</sup> day of July, 2012.

11  
12 LAW OFFICE OF MELANIE HILL

13 /s/ Melanie A. Hill

14 Melanie A. Hill, Esq.  
15 9345 W. Sunset Road, Suite 100  
16 Las Vegas, NV 89148  
17 Tel: (702) 362-8500  
18 Fax: (702) 362-8505  
19 Melanie@MelanieHillLaw.com  
20 Counsel for Defendant Michael Sabicer  
21  
22  
23  
24  
25  
26  
27  
28

**CERTIFICATE OF SERVICE**

This certifies that the undersigned has served a copy of the foregoing on the following counsel of record via the ECF system on July 19, 2012:

Brenda Weksler [Nancy\\_Vasquez@fd.org](mailto:Nancy_Vasquez@fd.org), [brenda\\_weksler@fd.org](mailto:brenda_weksler@fd.org)

C. Stanley Hunterton [shunterton@huntertonlaw.com](mailto:shunterton@huntertonlaw.com)

Craig W Drummond [craig@drummondfirm.com](mailto:craig@drummondfirm.com), [office@drummondfirm.com](mailto:office@drummondfirm.com)

Daniel J. Albregts [albregts@hotmail.com](mailto:albregts@hotmail.com), [kjlapointe2@hotmail.com](mailto:kjlapointe2@hotmail.com)

James A Oronoz [jim@oronozlawyers.com](mailto:jim@oronozlawyers.com), [alicia@oronozlawyers.com](mailto:alicia@oronozlawyers.com), [luke@oronozlawyers.com](mailto:luke@oronozlawyers.com)

Kimberly M Frayn [kimberly.frayn@usdoj.gov](mailto:kimberly.frayn@usdoj.gov), [norma.vizcarra2@usdoj.gov](mailto:norma.vizcarra2@usdoj.gov)

Margaret M Stanish [MStanish@wswlawlv.com](mailto:MStanish@wswlawlv.com), [WSW@wswlawlv.com](mailto:WSW@wswlawlv.com)

Melanie A Hill [Melanie@MelanieHillLaw.com](mailto:Melanie@MelanieHillLaw.com), [kristinsmith23@gmail.com](mailto:kristinsmith23@gmail.com)

Michael P. Kimbrell [mpkimbrell@aol.com](mailto:mpkimbrell@aol.com)

Michael J. Miceli [thomaspitaro@yahoo.com](mailto:thomaspitaro@yahoo.com)

Michael W Sanft [sanftlawgroup@mac.com](mailto:sanftlawgroup@mac.com), [diana.valencia82@gmail.com](mailto:diana.valencia82@gmail.com)

Philip Brown [thelasvegasdefender@gmail.com](mailto:thelasvegasdefender@gmail.com)

Terrence M Jackson [Terry.Jackson.Esq@gmail.com](mailto:Terry.Jackson.Esq@gmail.com)

/s/ Melanie A. Hill  
An Employee of Law Office of Melanie Hill

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

\*\*\*\*\*

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL SABICER,

Defendant.

Case No: 2:12-cr-00082-MMD-VCF-12

**ORDER GRANTING DEFENDANT  
MICHAEL SABICER'S UNOPPOSED  
MOTION TO CONDUCT A PRE-  
PLEA PRESENTENCE  
INVESTIGATION REPORT**

**ORDER**

IT IS HEREBY ORDERED that the Probation Department will prepare a Pre-Sentence Investigation Report on Defendant Michael Sabicer and make it available to counsel on or before July 27, 2012.

DATED this 20th day of July, 2012.



UNITED STATES DISTRICT JUDGE